

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,
LLC'S MEMORANDUM OF LAW IN OPPOSITION TO THE
PLAINTIFFS' STEERING COMMITTEE'S MOTION TO EXCLUDE
THE OPINIONS OF DRS. JENNIFER PERMUTH, ANALISA DIFEO, AND
JEFF BOYD**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Memorandum of Law in Opposition to the Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Drs. Jennifer Permuth, Analisa DiFeo, and Jeff Boyd.

1. Attached hereto as **Exhibit 1** is a true and correct copy of the CV of Jeff Boyd.

2. Attached hereto as **Exhibit 2** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel Clarke-Pearson, August 27, 2021, in this case.
3. Attached hereto as **Exhibit 3** is a true and correct copy of relevant excerpts of the transcript of the deposition of Judith Wolf, April 25, 2024, in this case.
4. Attached hereto as **Exhibit 4** is a true and correct copy of CONVERSE_HILARY_YALENEWHAVENHOSPITAL_00345.
5. Attached hereto as **Exhibit 5** is a true and correct copy of relevant excerpts of the transcript of the deposition of Daniel Clarke-Pearson, August 26, 2021, in this case.
6. Attached hereto as **Exhibit 6** is a true and correct copy of CONVERSE_HILARY_PROHEALTHPHYSICIANSOFHAMDEN_00069.
7. Attached hereto as **Exhibit 7** is a true and correct copy of relevant excerpts of the transcript of the deposition of Peter Schwartz, January 28, 2021, in this case.
8. Attached hereto as **Exhibit 8** is a true and correct copy of CONVERSE_HILARY_DRPETERSCHWARTZ_00125.
9. Attached hereto as **Exhibit 9** is a true and correct copy of the Third Amended Report of Rebecca Smith-Bindman, May 28, 2024, in this case.
10. Attached hereto as **Exhibit 10** is a true and correct copy of the Third Amended Report of Anne McTiernan, May 28, 2024, in this case.

11. Attached hereto as **Exhibit 11** is a true and correct copy of the Supplemental Report of Sonal Singh, November 15, 2023, in this case.
12. Attached hereto as **Exhibit 12** is a true and correct copy of relevant excerpts of the transcript of the deposition of Judith Wolf, September 13, 2021, in this case.
13. Attached hereto as **Exhibit 13** is a true and correct copy of relevant excerpts of the transcript of the deposition of Judith Wolf, September 14, 2021, in this case.
14. Attached hereto as **Exhibit 14** is a true and correct copy of relevant excerpts of the transcript of the deposition of Shawn Levy, January 11, 2019, in this case.
15. Attached hereto as **Exhibit 15** is a true and correct copy of relevant excerpts of the transcript of the deposition of Jack Siemiatycki, January 31, 2019, in this case.
16. Attached hereto as **Exhibit 16** is a true and correct copy of relevant excerpts of the transcript of the deposition of Sarah Kane, January 25, 2019, in this case.
17. Attached hereto as **Exhibit 17** is a true and correct copy of relevant excerpts of the transcript of the deposition of Jennifer Permuth in *Matthey v. Johnson & Johnson*, No. 2018-CA-4809-NC (Fla. Cir. Ct. Nov. 24, 2020).
18. Attached hereto as **Exhibit 18** is a true and correct copy of the Third Amended Report of Jack Siemiatycki, May 27, 2024, in this case.
19. Attached hereto as **Exhibit 19** is a true and correct copy of the Expert Report of Arch Carson, November 16, 2018, in this case.

20. Attached hereto as **Exhibit 20** is a true and correct copy of the Report of Judith Zelikoff, November 16, 2018, in this case.
21. Attached hereto as **Exhibit 21** is a true and correct copy of relevant excerpts of the transcript of the deposition of Michele Cote, March 21, 2024, in this case.
22. Attached hereto as **Exhibit 22** is a true and correct copy of relevant excerpts of the transcript of the deposition of Patricia Moorman, January 25, 2019, in this case.
23. Attached hereto as **Exhibit 23** is a true and correct copy of relevant excerpts of the transcript of the deposition of Judith Wolf, January 7, 2019, in this case.
24. Attached hereto as **Exhibit 24** is a true and correct copy of relevant excerpts of the transcript of the deposition of Shawn Levy, May 8, 2024, in this case.
25. Attached hereto as **Exhibit 25** is a true and correct copy of relevant excerpts of the transcript of the deposition of Jack Siemiatycki, March 27, 2024, in this case.
26. Attached hereto as **Exhibit 26** is a true and correct copy of relevant excerpts of the transcript of the deposition of Judith Zelikoff, January 21, 2019, in this case.
27. Attached hereto as **Exhibit 27** is a true and correct copy of relevant excerpts of the transcript of the deposition of Rebecca Smith-Bindman, February 7, 2019, in this case.
28. Attached hereto as **Exhibit 28** is a true and correct copy of relevant excerpts of the transcript of the deposition of Laura Plunkett, December 19, 2018, in this case.

29. Attached hereto as **Exhibit 29** is a true and correct copy of relevant excerpts of the transcript of the deposition of Laura Plunkett, December 21, 2023, in this case.

30. Attached hereto as **Exhibit 30** is a true and correct copy of relevant excerpts of the transcript of the deposition of Ghassan Saed, January 23, 2019, in this case.

31. Attached hereto as **Exhibit 31** is a true and correct copy of relevant excerpts of the transcript of the deposition of Brooke Mossman, Ph.D., April 8, 2019, in this case.

32. Attached hereto as **Exhibit 32** are true and correct copies of produced documents prefixed “SAED_SEPT222021_SUPPL_”.

33. Attached hereto as **Exhibit 33** is a true and correct copy of Mandarino, *The Effect of Talc Particles on Phagocytes in Co-Culture with Ovarian Cancer Cells*, 180 Environ. Res. 108676 (2020).

34. Attached hereto as **Exhibit 34** is a true and correct copy of Emi, *Transcriptomic and Epigenomic Effects of Insoluble Particles on J774 Macrophages*, 16(10) Epigenetics 1053 (2021).

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 22, 2024



Jessica Davidson